

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

EILEEN CRUZ,

Debtor.

Chapter 13

Case No. 25-16446-VFP

Hon. Vincent F. Papalia

NOTICE OF OBJECTION TO PLAN

The within Secured Creditor, Tarun Mehta, the second mortgagee on the Debtor's residence at 140 W Greenbrook Rd., Caldwell New Jersey 07006 ("Premises"), hereby objects to the Chapter 13 Plan in that the Plan calls for the sale of the Premises on or before October 1, 2025.

The grounds for the Secured Creditor's objection are:

1. The Debtor's Plan is not feasible and is in violation of 11 USC 1325 (a)(6).
2. The Plan does not call for the payment in full of the Secured Creditor's claim.

Dated: August 8, 2025

Law Offices of Michael S. Ackerman, LLC

/s/ Michael S. Ackerman

Michael S. Ackerman